Alex Rate ACLU of Montana P.O. Box 1968 Missoula, MT 59806 Phone: (406) 443-8590 ratea@aclumontana.org

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA MISSOULA DIVISION

SAMANTHA ALARIO, et al.,

Plaintiffs,

Lead Case No. CV 23-56-M-DWM

and

Member Case No. CV 23-61-M-DWM

TIKTOK INC.,

Consolidated Plaintiff,

v.

of Montana,

AUSTIN KNUDSEN, in his official capacity as Attorney General of the State

MOTION FOR *PRO HAC VICE* ADMISSION OF DAVID GREENE

Defendant.

Pursuant to Local Rule 83.1(d) of the United States District Court for the District of Montana, I respectfully move the Court for an order admitting David Greene, *pro hac vice*, so that Mr. Greene may appear as counsel for Amici Curiae

American Civil Liberties Union, American Civil Liberties Union of Montana, and

Electronic Frontier Foundation.

I am an attorney for the American Civil Liberties Union of Montana, P.O.

Box 1968, Missoula, Montana 59806. I am a member of the Bar of this Court who

will act as local counsel. This Court may readily communicate with me regarding

the conduct of this case, and insofar as Amici Curiae participate in this case, I will

be responsible for such participation as required by Local Rule 83.1(d)(7). The

Declaration of David Greene, attached hereto, supports the merits of this Motion

pursuant to Local Rule 83.1(d)(4). Mr. Greene is an active member in good

standing of the courts set forth in his Declaration and is of good moral character.

Therefore, I respectfully request that this Court grant the Motion for

Admission *Pro Hac Vice* and allow Mr. Greene to participate as counsel for Amici

Curiae American Civil Liberties Union, American Civil Liberties Union of

Montana, and Electronic Frontier Foundation in this matter. A Proposed Order is

attached.

Dated: August 8, 2023

/s/ Alex Rate

Alex Rate (Bar No. 11226)

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Counsel for Amici Curiae American Civil Liberties Union, American Civil Liberties Union of Montana, and Electronic Frontier Foundation

## **CONSENT**

Pursuant to Local Rule 83.1(d)(3), I, Alex Rate, attorney with the American Civil Liberties Union of Montana, P.O. Box 1968, Missoula, Montana 59806, certify that I am a member in good standing of the State Bar of Montana, and hereby consent to being associated as attorney of record for Amici Curiae American Civil Liberties Union, American Civil Liberties Union of Montana, and Electronic Frontier Foundation in the above-referenced case, and with whom the Court may readily communicate regarding the conduct of the case, upon whom papers shall be served, and who will be responsible to participate as required under Local Rule 83.1(d)(7).

Dated: August 8, 2023 /s/ Alex Rate

Alex Rate (Bar No. 11226) ACLU of Montana P.O. Box 1968 Missoula, MT 59806 Phone: (406) 443-8590 ratea@aclumontana.org

Counsel for Amici Curiae American Civil Liberties Union, American Civil Liberties Union of Montana, and Electronic Frontier Foundation

## **CERTIFICATE OF SERVICE**

I hereby certify that on this date, an accurate copy of the foregoing document was served electronically through the Court's CM/ECF system on registered counsel.

Dated: August 8, 2023 /s/ Alex Rate

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Counsel for Amici Curiae American Civil Liberties Union, American Civil Liberties Union of Montana, and Electronic Frontier Foundation